1	PATRICK E. McDONALD, ESQ.
2	Nevada State Bar No. 3526 601 South Seventh Street
3	Las Vegas, Nevada 89101 (702) 385-7227
4	Attorney for MANUEL GARZA
5	LINUTED OTATES DISTRICT COURT
6	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA
7	* * *
8	UNITED STATES OF AMERICA, )
9	Plaintiff, ) vs. )
10	) (13) MANUEL GARZA; (15) MICHAEL ) Case No.: 2:11-CR-00434-LDG-PAL
11	VALES;s et al.,
12	Defendants. )
13	JOINDER TO DEFENDANT MICHAEL VALES MOTION TO CONTINUE TRIAL
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15	Defendant MANUEL GARZA, by and through his attorney of record PATRICK E.
16	MCDONALD, ESQ., hereby joins in Co-Defendant Michael Vale's MOTION TO CONTINUE
17	TRIAL in the above styled matter.
18	DATED this 12th day of December, 2012.
19	
20	MCDONALD ADRAS,LLC
21	
22	By <u>/s/ PATRICK E. MCDONALD</u> PATRICK E. McDONALD, ESQ.
23	Nevada State Bar No. 3526
24	601 South Seventh Street Las Vegas, Nevada 89101
25	Attorney for Defendant
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## SUPPLEMENTAL POINTS AND AUTHORITIES

Defendant MANUEL GARZA hereby adopts the points and authorities submitted by Defendant Michael Vales, and submits the following to supplement that argument,

- 1. Discovery in this case consists of at least 8 CDs. According to Bates Stamps there are over 20,000 pages of discovery. Based on CA guidelines, if 1 minute per page for discovery review, the amount of discovery in this case would amount to over 330 hours, which translates into over two months of 40 hour weeks.
- Due to the undersigned case load in criminal justice and district court along with other federal cases (5), counsel is not yet prepared to go froward with trial in this case.
   Counsel has not completed discovery review.
  - 3. Manuel Garza does not object to the continuance.

DATED this 12th day of December, 2012.

## /s/PATRICK E. MCDONALD

PATRICK E. McDONALD, ESQ. Nevada State Bar No. 3526 601 South Seventh Street Las Vegas, Nevada 89101 (702) 385-7227 Attorney for MANUEL GARZA

**ORDER** 

IT IS SO ORDERED.

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DATED this day of December, 2012.

Lloyd D. George Sr. U.S. District Judge